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April 26, 2000

FD2000 Project Coordinator
Food Distribution Division - FNS
3101 Park Center Drive
Ford Avenue Bldg. - Room 601
Alexandria, VA 22302

Dear FD2000 Project Coordinator:

In 1990, I worked as a manager in a school lunchroom. The commodities we received were high in fat and many were undesirable. In 1994, after completing my masters in nutrition education, I returned to the school nutrition program as a director. I was amazed and impressed with the changes in the USDA products. It was obvious they had been listening to consumer demand and need. The changes made the monumental tasks of meeting the dietary guidelines an obtainable one.

It is, for the above reason, that I am dismayed that the federal government is considering overhauling the Food Distribution Program. In an assessment performed by USDA, the Child Nutrition Operations Study, Second Year 1992, 71% of the school food service managers interviewed rated the overall performance of the food distribution system as excellent or very good. In reviewing the 16 proposed changes some would be beneficial such as:

1. Developing written hold and recall procedures.
2. Decreasing the time for product holds at the school level.
3. Publishing commodity recall reimbursement procedures.
4. Providing a single USDA point of contact. (As long as each SFA is aware of who the contact individual is for their area.)

There are several points, however, that I am adamantly opposed such as:

1. Allowing vendors to use commercial labels on commodity foods. This would make it virtually impossible to keep accurate inventory records and food costs. Maintaining records of purchased food cost and commodity food is a valuable tool in management. School nutrition workers already have difficulty recording their food usage

correctly. With the above change, purchased food cost and commodity food cost would no longer be an effective tool in management because of the inaccuracy.

2. Allowing full substitutability. Although, we would like to believe that all vendors are basically honest; many times, we have found the opposite to be true. Managers have to be vigilant when receiving orders to ensure that the vendors have not substituted inferior products. I do not feel comfortable with the idea of giving high quality USDA products to vendors and having them substitute a different product to send to our schools.
3. Providing computer connectivity to the school district level. Although this is a wonderful concept, it is currently an impractical one. Our program assist several smaller districts. These districts lack the technology and trained staff to utilize computers efficiently.

The Food Distribution Program in Georgia has been a wonderful complement to the School Nutrition Program. Instead of completely changing a program that will effect over 60,000 SFAs nationwide, it would appear to be more beneficial to observe a program that is effective and emulate it. The State of Georgia Food Distribution Program would be a shining example for others to follow.

Sincerely,



Marian K. Rabon, M.S., R.D., L.D.
Nutrition Director

MKR:dmc

c: Mrs. Cherry Dupree
Area Consultant